

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED CENTRAL BANK,

Plaintiff,

V.

KANAN FASHIONS, INC., CREATIVE  
WAREHOUSING (CHICAGO), LLC, KANAN  
CRUISES, INC., KANAN HOLDINGS, LLC.,  
VARSHA SHAH and MEHUL SHAH,

Defendants.

Case No. 10 cv 00331

Judge Robert W. Gettleman

Magistrate Michael Mason

**JOINT STATUS REPORT ON ESI SEARCH TERMS**

Pursuant to this Court's Order of August 30, 2010, Plaintiff United Central Bank (the "Plaintiff") and Defendants Kanan Fashions, Inc., Creative Warehousing (Chicago), LLC., Kanan Cruises, Inc., Kanan Holdings, LLC., Varsha Shah and Mehul Shah ("Defendants"), provide this Joint Status Report of August 11, 2010 regarding discovery as follows:

In connection with Plaintiff United Central Bank's pending Corrected Motion for Protective Order Limiting Discovery and pursuant to the Court's July 30, 2010 Order, the parties met and conferred on August 6, 2010 met and conferred to attempt to agree on search terms for Plaintiff's ESI intended to identify documents related to the parties and transactions at issue. On August 8, 2010, Defendants submitted to Plaintiff proposed revised search terms, a proposed date range of February 1, 2009 to the present, and certain designated Plaintiff custodians for the search. The parties have reached preliminary agreement on said search terms. Plaintiff has used such terms and the Defendants' requested date range to run an ESI search of emails only for the designated custodians. The date range searched is without prejudice to Plaintiff's request in its Corrected Motion for Protective Order for a more limited date range. Plaintiff has provided Defendants with a spreadsheet of the number of hits resulting for such custodians using Defendants' requested search

terms and date range, the results of which indicate additional refinement of certain of the search terms is needed. The parties believe that further cooperation on search terms refinement will be successful without Court intervention.

The parties remain at issue on the relevant date range of Plaintiff's ESI production and the issue of whether production should be in native format (Defendants' position) or in TIF format with native production where reasonably requested (Plaintiff's position) and request further ruling on these issues.

August 11, 2010

UNITED CENTRAL BANK

KANAN FASHIONS, INC., CREATIVE  
WAREHOUSING (CHICAGO), LLC,  
KANAN CRUISES, INC., KANAN  
HOLDINGS, LLC, VARSHA SHAH and  
MEHUL SHAH

By:     /s/ Vilia M. Dedinas                      
One of its Attorneys

By:     /s/ Eric Grossman                      
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